

This is in response to iBiquity's report on nighttime IBOC.

In-Band, On-Channel Digital Audio Broadcasting (IBOC-DAB) will never be successful. American consumers do not want it; they're happy with AM and FM signals the way they are. Besides, analog radio is superior to digital radio. AM Stereo and FM Stereo signals are already capable of CD-quality sound and separation; there really is no need for IBOC-DAB; there is no market for this low-quality form of radio.

Several facts about IBOC-DAB are misrepresented. First off, the use of IBOC-DAB at night (or any time of day whatsoever) is a waste of spectrum space. I conducted my own research into IBOC-DAB at night when WLW (700 kHz) Cincinnati, OH was conducting IBOC tests. Using a General Electric Superadio III and the built-in antenna, as well as a Realistic TM-152 C-QUAM AM Stereo tuner, WLW's IBOC sidebands wiped out 710 kHz, and caused massive interference to KSTL (690 kHz) St. Louis, MO. In fact, even the AM Stereo pilot suffered from interference from WLW's IBOC sidebands. The sidebands also weakened signals on 680 and 720 kHz, respectively.

It's even worse during the day. Locally, KFUD (850 kHz) Clayton, MO, is testing IBOC. My location is ten miles from KFUD's transmitter site at Concordia Seminary. The IBOC sidebands from KFUD wipe out everything from 820 to 870 kHz; the signal of WCBW (880 kHz) Highland, IL suffers from interference from KFUD's IBOC sidebands. Lesser interference is suffered to the reception of WHB (810 kHz) Kansas City, MO and WLS (890 kHz) Chicago, IL due to KFUD's IBOC sidebands. The IBOC sidebands for KFUD has also wiped out another previously usable signal in the St. Louis area: KOTC (830 kHz) Kennett, MO.

Now, at a distance of one mile from the transmitter site (in the 7700 block of Clayton Road in Richmond Heights, MO), the IBOC sidebands from KFUD wipe out a wider frequency range. Using a Jensen after-market car radio, KFUD's IBOC sidebands interfere with the signal of KREI (800 kHz) Farmington, MO. These sidebands also wipe out everything between 810 and 870 kHz, as well as 890 kHz; the interference to WCBW on 880 is much worse. In parts of Clayton and Richmond Heights, WCBW, which has a strong signal when KFUD is in analog mode, is totally wiped out by KFUD's IBOC sidebands. This proves, once and for all, that the AM, FM and shortwave bands ARE NOT SUITED for digital radio. IBOC is NOT THE ANSWER to radio's alleged "problems".

The FCC, along with the National Association of Broadcasters and the Corporation for Public Broadcasting, should withdraw support for iBiquity's failed IBOC-DAB system at once, embrace improvement of existing technologies on AM and FM, such as C-QUAM AM Stereo and the current FM Stereo system, and improve receiver quality through requiring Digital Signal Processing (DSP) on all receivers sold in the United States. IBOC-DAB (an already obsolete system) will make ALL of our current receivers obsolete. It is TOTALLY INCOMPATIBLE with our current receivers.

Instead of IBOC-DAB, the FCC, NAB and CPB should work together to find a separate band for digital radio broadcasting, only using the proven Eureka 147 system that's catching on in Europe. Frequencies above 1000 MHz (1 GHz) are more suited to digital radio than the current AM, FM or shortwave bands. The FCC, NAB and CPB should also learn to accept more competition for the radio audience, and include more independent voices. IBOC-DAB is a very expensive technology that the consumer will not support; they won't pay upwards of \$1,000 for a receiver that features such an inferior technology.

Again, I urge the FCC, the NAB and the CPB to withdraw support for IBOC-DAB at once.